

ROBBINS GELLER RUDMAN
& DOWD LLP
SHAWN A. WILLIAMS (213113)
Post Montgomery Center
One Montgomery Street, Suite 1800
San Francisco, CA 94104
Telephone: 415/288-4545
415/288-4534 (fax)
shawnw@rgrdlaw.com
– and –

DANIELLE S. MYERS (259916)
MICHAEL ALBERT (301120)
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)
dmyers@rgrdlaw.com
malbert@rgrdlaw.com

[Proposed] Lead Counsel for [Proposed] Lead Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

WILLIAM LAMARTINA, Individually and on)
Behalf of All Others Similarly Situated,)
Plaintiff,)
vs.)
VMWARE, INC., et al.,)
Defendants.)

Case No. 5:20-cv-02182-EJD

CLASS ACTION

DECLARATION OF DANIELLE S. MYERS
IN SUPPORT OF MOTION FOR
APPOINTMENT OF LEAD PLAINTIFF
AND APPROVAL OF LEAD PLAINTIFF'S
SELECTION OF LEAD COUNSEL

DATE: July 23, 2020
TIME: 9:00 a.m.
CTRM: 4, 5th Floor
JUDGE: Hon. Edward J. Davila

1 I, DANIELLE S. MYERS, declare as follows:

2 1. I am an attorney duly licensed to practice before all of the courts of the State of
3 California and this Court. I am a member of the law firm Robbins Geller Rudman & Dowd LLP,
4 counsel of record for Northeast Carpenters Pension Fund (the "Pension Fund"), and proposed lead
5 counsel for the class. I make this declaration in support of the Pension Fund's Motion for
6 Appointment as Lead Plaintiff and Approval of Lead Plaintiff's Selection of Lead Counsel. I have
7 personal knowledge of the matters stated herein and, if called upon, I could and would competently
8 testify thereto.

9 2. Attached are true and correct copies of the following exhibits:

10 Exhibit A: Notice of pendency of class action published on *Globe Newswire*, a national
11 business-oriented wire service, on April 1, 2020;

12 Exhibit B: The Pension Fund's Sworn Certification; and

13 Exhibit C: The Pension Fund's estimate of losses, prepared by counsel.

14 I declare under penalty of perjury that the foregoing is true and correct. Executed this 1st day
15 of June, 2020, at San Diego, California.

16 s/ Danielle S. Myers
17 _____
DANIELLE S. MYERS

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on June 1, 2020, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Danielle S. Myers
DANIELLE S. MYERS

ROBBINS GELLER RUDMAN
& DOWD LLP
655 West Broadway, Suite 1900
San Diego, CA 92101-8498
Telephone: 619/231-1058
619/231-7423 (fax)

E-mail: dmyers@rgrdlaw.com

Mailing Information for a Case 5:20-cv-02182-EJD Lamartina v. VMware, Inc. et al**Electronic Mail Notice List**

The following are those who are currently on the list to receive e-mail notices for this case.

- **Patrick V. Dahlstrom**
pdahlstrom@pomlaw.com
- **J Alexander Hood , II**
ahood@pomlaw.com,tcrockett@pomlaw.com,abarbosa@pomlaw.com
- **Jeremy A. Lieberman**
jalieberman@pomlaw.com,tcrockett@pomlaw.com,disaacson@pomlaw.com,abarbosa@pomlaw.com,lpvega@pomlaw.com
- **Jennifer Pafiti**
jpafiti@pomlaw.com,jalieberman@pomlaw.com,ahood@pomlaw.com,egoodman@pomlaw.com,disaacson@pomlaw.com,abarbosa@pomlaw.com
- **Brian Jared Schall**
brian@schallfirm.com

Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)